

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

SADDLEBACK EXPLORATION, LLC,

Plaintiff,

V.

BARBARA BRUNELLE, et al. ,

Defendants.

§
§
§
§
§
§
§
§
§

CIVIL NO. 4:23-CV-03091

**DEFENDANTS' M&M MINERALS, LLC AND
TK3 MINERALS, LLC EXPERT DISCLOSURES**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Defendants M&M Minerals, LLC and TK3 Minerals, LLC and pursuant to and as required by the scheduling order entered in this case, makes these expert disclosures, disclosing the information as required by *Federal Rule of Civil Procedure* 26(a)(2)(B) and the Court's scheduling order.

A. Retained or Specially Employed Experts

1. The following persons are those whom Defendants M&M Minerals, LLC and TK3 Minerals, LLC have retained or specially employed to provide expert testimony:

a. Mr. Jamey Parsons

i. Contact Information:

ii. Mr. Parsons has reviewed the materials attached to the Affidavit of James A. Parsons which is attached hereto as Exhibit 1.

iii. Mr. Parsons is of the opinion that the records attached to such affidavit in Exhibit 1 are property and other records related to the mineral interests of TK3 and M&M, which he obtained from public offices, such as the county clerk. Mr. Parsons is of the opinion that the records reflect chain of title for the mineral interests of TK3 and M&M.

- iv. Mr. Parsons's resume reflecting his credentials is attached as Exhibit 2.
- v. Mr. Parsons has not testified in the last four years.
- vi. Mr. Parsons is being compensated at the rate of \$75 per hour, with repayment of reasonable expenses such as for travel.

b. Kristen A. Mynar

- i. Contact Information: 400 Austin Ave., Suite 800, Waco, Texas 76710, 254-755-4100
- ii. Mrs. Mynar has reviewed the materials attached to the Affidavit of Kristen A. Mynar which is attached hereto as Exhibit 3.
- iii. Mrs. Mynar is of the opinion that the records attached to such affidavit in Exhibit 3 are property and other records related to the mineral interests of TK3 and M&M, which were obtained from public offices, such as the county clerk or district clerk. Mrs. Mynar is of the opinion that the records reflect chain of title for the mineral interests of TK3 and M&M and show that the interests of TK3 and M&M are not dependent on any deeds or transfers from Paul Vitek to Hubert Hoffman, as trustee for Mid-Tex Company or otherwise, but are instead based on a deed from Vitek to J.H.M. Harrison.
- iv. Mrs. Mynar has experience researching deed and title issues as part of her probate and estate work.

Her credentials can be found here:

<https://www.namanhowell.com/professionals/Kristen-A-Mynar>

- v. Mrs. Mynar's testifying history is as follows: None
- vi. The compensation being paid to Mrs. Mynar for her time in providing expert services is as follows: \$400 per hour of work.

Respectfully submitted,

/s/ Joe Rivera

Joe Rivera

State Bar No. 24065981

jrivera@namahowell.com

NAMAN, HOWELL, SMITH & LEE, PLLC

400 Austin Avenue, Suite 800

Waco, Texas 76701

(254) 755-4100

FAX (254) 754-6331

ATTORNEYS FOR DEFENDANT

M&M MINERALS, LLC AND

TK3 MINERALS, LLC,

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of this Defendants' Expert Disclosures has been served on all other parties that have appeared by way of the Court's ECF system, which generated notice of service on the counsel of record for each party on the 28th day of June 2024.

/s/ Joe Rivera

Joe Rivera